#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Citizens Energy	AZ	Issue #	CUBR	EEI/UBP	Calif.
#	business Area/Rule	AFS	SRP	IEP	TRICO	Grhamn County and Duncan tend to be different]	Services	Best Practi ce		COBR	EEWOBP	Caiii.
1	Bill is generated by UDC	Yes	N/A	Yes	Yes	Yes	Yes			Yes	Yes	In "Partial Consolidated" UDC calculates including taxes & surcharges and delivers to ESP using UDC's normal billing cycle. If ESP reads meater, it must provide UDC data in time to bill. Another option is "Full consolidated" where ESP calculates UDC charges.
	metered accounts to bill	Yes	Yes	Yes	Yes	Yes	Yes					Yes
	Third parties may read the meter (per the rules)		N/A	Yes	Yes	Yes	Yes					Yes
4	Each party is performing validation on meter and billing data	Yes	N/A	Yes	Yes	Yes	Yes					
	UDC is not required to pay ESP for ESP charges for UDC consolidated until the customer pays the UDC		N/A	Yes	Yes	Yes	Yes					
	ESP is liable to the UDC for UDC charges for ESP consolidated billing		N/A	Yes	Yes	Yes	Yes		17	Yes, per the UDC's tariff schedule, for all undisputed UDC charges. The receipt of UDC charges by the ESP starts the cycle. UDC is notified by ESP, of disputed charges, electronically.		Yes, all undisputed charges.
7	Each UDC associates a customer to a billing cycle	Yes	Yes	Yes	Yes	Yes	Yes					
	UDCs and ESPs rely on electronic data		N/A	Yes	Yes	Yes	N/A			Yes	Both supplier and utility must demonstrate the technical capability to exchange information electronically using the standardized electronic transactions.	electronic transmittal or other means
9	Bills are presented in US currency only	Yes	Yes	Yes	Yes	Yes	Yes					
10		commercial and 1 residential		Direct Access rate for every Standard Offer rate.	Direct Access rate for every Standard Offer rate.							

Draft Document as of 2/9/00 1 of 9

#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Citizens Energy	AZ	Issue #	CUBR	EEI/UBP	Calif.
						Grhamn County and Duncan tend	Services	Best Practi				
11	Validation Rules	Not addressed at this time	Not addressed at this time	Not addressed at this time	Not addressed at this time	to be different] Not addressed at this time	N/A	се	19 (24,5)	For charges sent to billing party, billing party, billing party has 48 hours to reject non-billing party file. Billing party must send electronic rejection with codes. Also, billing party must send electronic notification to non-billing party if bill not issued/no time.		
12	Due date on bill	All bills rendered by the Company are due and payable no later than 15 calendar days from the billing date	21 calendar days from bill date (Bill date and Invoice date mean the same)	Payments for TEP products and services shall be delivered to TEP within 10 business days of the TEP invoice date. (Bill date and Invoice date mean the same)			All bills rendered by the company are due and payable 15 days from billing date				(6) The due dates, and other payment terms and conditions must be identical for Supplier and Utility charges when a consolidated bill is rendered.	
13	Number of billing cycles in a month	21	21	21	8	9 (Navopache)	9	9			rendered.	
14		No less than 25 days and no more than 35 days	26 - 32	No less than 25 days and no more than 35 days	No less than 25 days and no more than 35 days	1	25-35					
15	Time frame between read date & bill date	3-7 Calendar days	1-3 Calendar days	3-5 Working days	1- 3 Working days		1-3 calander days				c. The Non-Billing Party Charges must be received by the Billing Party within forty-eight (48) hours commencing on the first business day following receipt of valid usage data. Usage data shall be made available to all parties in sufficient time to ensure the utility bill is not delayed from the utility's normal billing cycle.	
16	Bill data will be transported to the ESP via	Value Added Network (VAN)	Not applicable for ESP Consolidated Billing. Data transport is Internet EDI for all data transactions except 820.	Exolink (VAN)	VAN (?)		N/A					electronic transmittal or other means
17	information	APS relies on the VAN to provide data security. Data is sent over a secured socket to the VAN	S/MIME	TEP encrypts before transmitting to Exolink and Exolink handles the security to Trading Partner.			N/A					
18		810 will be sent the same day as the bill date	N/A	Flat file will be sent to Exolink same day as bill date, Exolink will send to Trading Partner the same day			N/A		5	commencing on the first	operational time frames which have been defined to support the billing options available.	

Draft Document as of 2/9/00 2 of 9

#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Grhamn County and Duncan tend	Citizens Energy Services	Best Practi	Issue #		CUBR	EEI/UBP	Calif.
19	for meter reads between UDC & ESP	may request a verify read. The cost of such rereads, which is \$10, may be charged to the ESP, provided that the	If SRP is the MRSP, the ESP may request a verify read. The cost of such rereads, is \$for Metro Area and &outside Metro Area, may be charged to the ESP, provided that the original reading was not in error.	request of its customer, the customer's ESP, TEP or the billing entity, reread that		to be different]	N/A	се	7,19 (24,5)		If unresolved within 30 days, may go to mediation or binding arbitration, by mutual agreement.		
20	UDC & customer	customer may request a verify read. The cost of such	If SRP is the MRSP, the ESP may request a verify read. The cost of such rereads, a charge \$_ for Metro Area and &_ outside Metro Area, may be charged to the ESP, provided that the original reading was not in error.	The MRSP shall, at the request of its customer, the customer's ESP, TEP or the billing entity, reread that customer's meter within ten			N/A						UDC transmits revised charges to the ESP and the customer will be responsible for obtaining refunds of overcharges from the ESP. For undercharges, the ESP may either pay the utility the adjusted charges and collect them from the customer or file a DASR to switch to separate billing.
21	for bill data between UDC & ESP	ESP notifies APS via e-mail or phone of any disputed bill data. APS will research disputed data and re-bill if needed.		The ESP shall be responsible for notifying the customer and adjusting the bill for ESP charges affected by the meter or billing error. TEP shall be responsible for any recalculation of any incorrect TEP charges. Following the receipt of any recalculated charges from TEP, the ESP will apply the charges or credits to the customer's next normal monthly bill, unless the parties otherwise agree that the ESP send an interim bill including the TEP charges to the customer. TEP will transmit corrected billings to the ESP for incorporation in the customer's bill using one of the following methods: a. By sending a cancellation notice, which cancels the bill in its entirety, and if appropriate, a re-bill will be included in same transmission. b. By transmitting an adjustment amount with a description of the			N/A		7,19 (24,5)			Acceptance or rejection(by billing party), accompanied by appropriate error code(s), shall be communicated via the appropriate standardized electronic transaction within forty-eight (48) hours commencing upon receipt of the charges. If the transaction is deemed accepted, then within forty-eight (48) hours the Billing Party must bill or notify the Appropriate standardized electronic transaction when a bill is not issued. (2) If the Non-Billing Party with the appropriate standardized electronic transaction when a bill is not issued. (2) If the Non-Billing Party with the appropriate time frame and the transaction is rejected, the Non-Billing Party may, if time permits, resubmit a corrected file containing billing charges for inclusion in the	

Draft Document as of 2/9/00 3 of 9

#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Grhamn County and Duncan tend to be different]	Citizens Energy Services	AZ Best Practi ce	Issue #	CUBR	EEI/UBP	Calif.
	Dispute resolution process for bill data between UDC & customer	phone of any disputed bill data. APS will research disputed data and re-bill if needed.	Customer notified SRP via phone of any disputed bill data. APS will research disputed data and re-bill if needed.	responsible for notifying the customer and adjusting the bill for ESP charges affected by the meter or billing error. TEP shall be responsible for any recalculation of any incorrect TEP charges. Following the receipt of any recalculated charges from TEP, the ESP will apply the charges or credits to the customer's next normal monthly bill, unless the parties otherwise agree that the ESP send an interim bill including the TEP charges to the customer. TEP will transmit corrected billings to the ESP for incorporation in the customer's bill using one of the following methods: TEP will transmit corrected billings to the ESP for incorporation in the customer's bill using one of the following methods: a. By sending a cancellation notice, which cancels the bill in its entirety, and if appropriate, a re-bill will be included in same	cancels the bill in its entirety, and if appropriate, a re-bill will be included in same transmission. By transmitting an adjustment amount with a description of the adjustment.		Customer notifies Citizens via phone or office visit of any disputed bill data. Citizens will research disputed data and rebill if needed.					Adjust its bill to the ESP. Within 15 days of the UDC sending the adjusted bill, the ESP may either assume responsibility for the adjusted charges, or file a DASR to switch to separate billing.
23		All APS customers, including Direct Access customers, shall receive mandated legal, safety and other notices equally in accordance with A.A.C. R14-2-204 (B). If the ESP is providing consolidated billing, APS shall make available one (1) copy of these notices to the ESP for distribution to customers or, at the ESP's request, in electronic format to the ESP for production and communication to electronically billed customers. If APS is providing consolidated billing services, APS shall continue to mail these notices in the billing envelope and may use the billing envelope as it does in current practices for providing such information.		All TEP customers, including Direct Access customers, shall be provided with all mandated legal, safety and other notices in accordance with ACC regulations. TEP shall make available one hard copy of all mandated legal, safety and other notices per customer to the ESP for distribution to its customers, or at the ESP's request, in electronic format for production and communication to its electronically billed customers. TEP and the ESP may agree to use email to provide language tha is to appear in printed forma on the ESP consolidated bill Messages to a specific customer may be inserted in description lines included with calculated TEP charges	t t		N/A		10		Billing party responsible for delivering information to customers which is mandated by regulations.	
24	Data file format	EDI 810 version 4010	N/A	Flat files sent via Exolink (wil transmit the file as it was submitted from Tucson or for a fee, transmit it as the ESP requests. After AZ 810 is standardized, Exolink will transmit using the AZ 810)			N/A				Both supplier and utility must demonstrate the technical capability to exchange information electronically using the standardized electronic transactions.	

Draft Document as of 2/9/00 4 of 9

#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Citizens Energy	AZ	Issue #		CUBR	EEI/UBP	Calif.
#	business Area/Rule	APS	SKP	IEP	IRICO	Grhamn County	Services	Best	issue #		CUBR	EEI/UBP	Caiii.
						and Duncan tend		Practi					
						to be different]		ce					
25	How & when data is	The MRSP designated for the		All estimated interval or			N/A		19,24,5				
	estimated & who does the			monthly meter reads shall be					.0,2.,0				
	estimation	responsible party for		sent to TEP using the EDI									
		performing and		format. Meters will be									
		communicating the estimated		estimated on date set forth									
		read. Estimated reads can		in the TEP Meter Reading									
		occur if the MRSP is unable		Schedule. Reads will be									
		to get reads due to access		posted by the MRSP to the									
		issues, extreme weather		TEP FTP server by 3:00									
		conditions, equipment failure		p.m. the day following the									
		or if a customer who reads		meter read for the meters									
		his own meter fails to deliver		that the MRSP is									
		his meter reading data etc		responsible for reading. The									
		When APS is the MRSP, the		meter reads from TEP will									
		meter read estimates will be		be available on the TEP									
		based on either the customer usage during the same month		FTP server by 3:00 p.m. the day following the meter read									
		of the previous year or based		for the meters that TEP is									
		on the amount of usage		responsible for reading. All									
		during the preceeding month		estimated data will be clearly									
		(article 2-210)		marked with an explanation									
		(article 2 210)		of the reason for the									
				estimation.									
26	Disconnect & reconnect	DOESN'T APPLY TO ESP	DOESN'T APPLY TO ESP	DOESN'T APPLY TO ESP			Doesn't apply to					Utility may disconnect	
	for nonpayment	CONSOLIDATED APS will	CONSOLIDATED SRP will notify	CONSOLIDATED In the			ESP consolidated					for non-payment of	
		notify the customer and the	the customer and the customer's	event of Direct Access			billing. Citizens will					supplier charges if	
		customer's ESP of intent to	ESP of intent to disconnect. SRP	customer non-payment of			notify the					permitted by laws and	
		disconnect. APS will also	will also notify the ESP once the	charges for TEP provided			customer and the					regulations. Suppliers	
		notify the ESP once the	customer is disconnected. SRP	services, TEP will be			customers ESP of					shall indemnify the utility	
		customer is disconnected. A	will reconnect electric service for a				intend to					against any claims by	
		service charge will be	service fee when the criteria for	disconnect activity			disconnect.					the customer.	
		imposed on the customer if a	reconnection has been met.	regardless of the MSP or			Citizens will also						
		filed call is performed to leave		ESP servicing that			notify the ESP						
		door hanger or collect. APS		customer. Disconnection			once the customer						
		will reconnect electric service		can occur at any time after			is disconnected. Citizens will						
		for a service fee when the criteria for reconnection has		the payment due date for			reconnect electric						
		been met.		non-payment of any TEP- provided service. TEP will			service for a						
		been met.		send a copy of the Direct			service fee when						
				Access customer's			the criteria for						
				Disconnect Notice for non-			reconnection has						
				payment to the ESP. This			been met.						
				notice shall include customer									
				name, address, notice date,									
				account number, delinquent									
				amount, total amount due,									
				due date, the UNI number									
				and ESP account number.									
				TEP will notify the ESP at									
1				the end of each day which									
				Direct Access customers									
				remain disconnected. This									
				notification will include the									
				UNI number and ESP									
Щ_	I	<u> </u>		account number. With the									

Draft Document as of 2/9/00 5 of 9

#	Business Area/Rule	APS SRP	TEP TRICO	Other (Co-ops) [Citizens Energy Grhamn County Services	AZ Best	Issue #	CUBR	EEI/UBP	Calif.
				and Duncan tend to be different]	Practi ce				
27	Final bills for Bundled Charges	customer can be disconnected under his DA	TEP will not hold the ESP responsible for any customer Full Service final bills. The customer can be disconnected under his DA account for non-payment of TEP final	Citizens will not hold ESP responsible for any customer Full Service final bills. The customer can be disconnected under his DA account for non-payment of Citizens final bill.		22	Outstanding prior balances are not transferred in any switch, UDC to ESP, ESP to ESP, ESP to UDC.	Outstanding prior balances are not transferred when a customer switches from the Utility to a Supplier, switches from one Supplier to another, or switches from a Supplier to default generation service. The Utility or Supplier may deny the Consolidated Billing option to a customer if the customer's account is at least thirty (30) days overdue.	
28	Final bills for DA Charges		In the case of a physical disconnect final bill, TEP will provide the ESP with the TEP final bill charges by 3:00 p.m. on the fifth business day following the actual disconnect date. If TEP billing charges have not been received by such date, the ESP may render the bill without such TEP charges; however, the ESP shall include a message on the bill stating that said charges are forthcoming. TEP will then render a separate bill for the TEP charges, unless a mutual agreement is made between TEP and the ESP to have a final bill produced and sent to the customer for the TEP final charges. TEP charges shall be calculated based on the existing TEP billing cycles regardless of the party providing the meter reading. TEP charges shall be conveyed to the ESP using ExoTran™.	N/A					
29	Back bills for customer billing	Persuant to Schedule 1, APS can backbill up to 6 months UDC Consolidated - Back bill up to 6 months	Persuant to Article 24 TEP can backbill up to 6 months	For the period of 3 months immediately preceding the removal of such meter from service for test or from the time it was in services since the last test, but not exceeding 3 months since the meter shall have been shown to be in error by the test. B. From the date the error occurred, if the date of the cause can be definitely fixed.	\$:	7,19,24,5			

Draft Document as of 2/9/00 6 of 9

#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Grhamn County and Duncan tend	Citizens Energy Services	AZ Best Practi	Issue #		CUBR	EEI/UBP	Calif.
30		energy use. ESP shall ensure that a heavy duty lock ring is installed to secure any meter that does not require a monthly local (i.e., manual) meter read or shall utilize a light duty lock ring to secure meters equipped with meter tamper reporting technology equipped with tamper reporting capabilities. The Parties agree to preserve any evidence of unauthorized energy use. Once unauthorized energy use is suspected, APS, in its sole discretion, may take any or all of the actions permitted under APS' applicable tariffs and	meter that does not require a monthly local (i.e., manual) meter read or shall utilize a light duty lock ring to secure meters equipped with meter tamper reporting technology equipped with tamper reporting capabilities. The Parties agree to preserve any evidence of unauthorized energy use is suspected, SRP in its sole discretion, may take any or all of the actions permitted under SRP applicable tariffs and schedules and shall notify ESP of any such action taken. SRP will coordinate with the ESP, the estimated amount of usage that will be back	rules, TEP has the right to disconnect electric service to the customer for a variety of reasons, including, but not limited to, the non-payment of TEP final bills or any past due charges by the customer, or evidence of safety violations, energy theft, or fraud, by the customer. TEP will perform the disconnect for non-payment regardless of the ESP. The following provides for service disconnects and reconnects. TEP shall notify the customer's ESP of TEP's intent to disconnect electric service for the non-payment of TEP charges prior to disconnecting electric service to the customer. TEP shall further notify the ESP at the time the customer has been disconnected. To the extent authorized by the ACC, a		and Duncan tend to be different]	N/A	Practi ce					
31	Policy for ESPs to change customer's UDC billing cycle	Currently, this is not an option	N/A	service charge may be imposed on the customer if This is not an option at this time.			This is not an option				meter read/billing cycle. But ESP must select another UDC defined read schedule(unless customer has remote read).	Any party which uses metering data in its business processes can request a change in meter read date. Whether or not to change a meter read date should be determined by the metering entity. The metering entity, The metering entity should be enabled to make changes of meter read date, subject to objective guidelines which are mutually acceptable to affected parties and with proper advance notice.	
32	When are new account numbers assigned	If the customer is an existing APS customer switching to DA, a new UDC Customer Account Number will be assigned during the processing stages of each incoming RO DASR. If the customer is a new customer within APS' territory, a new UDC Customer Account Number will be assigned during the initial application with our call center. In addition, the account number could change if certain order or billing work is done.	Assigned during re-districtricting and if certain order work is performed,	UDC Customer Account Numbers are tied to the customer and do not change.	Assigned during re- districtricting and if certain order work is performed,		UDC Customer account numbers are assigned and are tied to their location. Their CID (customer ID) number doesn't change.						
33	When is a new read cycle assigned	During re-districting.		During re-districting (TEP has not redistricted in 5 years.)			N/A						

Draft Document as of 2/9/00 7 of 9

	Decelorate Asset (Decle	APS	SRP	TEP	TDIOO	011(0)[O'!!		1		OUDD	FFIMIDD	0-114
#	Business Area/Rule	APS	SRP	IEP	TRICO	Other (Co-ops) [Grhamn County	Citizens Energy Services	AZ Best	Issue #		CUBR	EEI/UBP	Calif.
						and Duncan tend	CCIVICCS	Practi					
						to be different]		ce					
34	How are customer	Dual Billed - only retain	Dual Billed - only retain portion of	Dual Billed - only retain	Dual Billed - only retain	-	Dual Billed - only		23				
			the deposit to secure the UDC	portion of the deposit to	portion of the deposit to		retain portion of						
		secure the UDC charges only,		secure the UDC charges	secure the UDC charges		deposit to secure						
			deposit will be refunded. ESP	only, the remaining deposit	only, the remaining		the UDC charges -						
		refunded. ESP Consolidated		will be refunded. ESP	deposit will be refunded.		only, the remaining						
		- 100% of the customer	customer deposit is applied to the	Consolidated - 100% of the			deposit will be						
		deposit is applied to the	Standard Offer final bill and any	customer deposit is applied	100% of the customer		refunded. ESP Consolidated -						
		Standard Offer final bill and any remaining deposit will be	remaining deposit will be refunded	to the Standard Offer final bill and any remaining	deposit is applied to the Standard Offer final bill		100% of customer						
		refunded to the customer.	to the customer. UDC Consolidated - only retain portion		and any remaining		deposit is applied						
			of the deposit to secure the UDC	the customer. UDC	deposit will be refunded		to the standard						
		retain portion of the deposit to		Consolidated - only retain	to the customer. UDC		offer Final Bill and						
		secure the UDC charges only,		portion of the deposit to	Consolidated - only		any other						
		the remaining deposit will be		secure the UDC charges	retain portion of the		remianing deposit						
		refunded.		only, the remaining deposit	deposit to secure the		will be refunded to						
				will be refunded.	UDC charges only, the		the customer.						
					remaining deposit will be		UDC Consolidated						
					refunded.		N/A						
35	How are rebate/rebills	Reverse the bill that was					N/A		7				
33		produced in error and rebill					14/1		ľ				
		with correct information in the											
		same transaction.											
36	Will billing service End and	Yes	N/A	Yes			N/A						
	Beginning periods be												
	passed in the 810												
37		No	N/A	No			N/A		13				
	date be passed on the 810												
	for ESP Consolidated												
38	Will levelized billing be	No for ESP Consolidated.	Yes for UDC and Dual Billing	No			N/A		17		Billing party	Other billing features,	
•••	offered to Direct Access	Yes for Dual and UDC		1								such as budget, or equal	
		Consolidated billing and										monthly, billing may be	
	charges	,										offered by the Billing	
	-										ESP and UDC.	Party, provided the	
												Billing Party and the Non-	
												Billing Party agree.	
												Each party is	
												responsible for deciding	
												whether to offer budget	
												billing for its charges	
												only. Neither party is required to offer budget	
												billing for the other	
												party's charges.	
39	Will Summary billing be	NO for ESP Consolidated		No			N/A		21 (15)			1 7	
		billing. Yes for Dual and UDC							,				
		Consolidated billing											
40		Not addressed at this time	Not addressed at this time	Not addressed at this time	Not addressed at this	Not addressed at	N/A						
	compliance testing				time	this time							
	procedure?												
41	Notification buy ESP to										60 days	60 days	
	UDC of billing option												
	change			1	1								

Draft Document as of 2/9/00 8 of 9

#	Business Area/Rule	APS	SRP	TEP	TRICO	Other (Co-ops) [Citizens Grhamn County and Duncan tend to be different]	es B	AZ Issue # Best racti ce	CUI	SR EEI/UBP	Calif.
42	Elements on ESP consolidated bill								Industria Comply applicabl consume	except for: separation of supplier and utility charges, large commercial/industrial customer and supplier	s, II e e Is.
43	Access for uncollectible accounts to SHARE or charitable service funds.								ESPs ca access if can't disconne non-payr due to regulatio This is fo or conso billing.	they ct, for nent, us. c dual	

Draft Document as of 2/9/00 9 of 9